

United States District Court
Western District of Texas
Midland Division

FILED

JUN 26 2020

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY: See
DEPUTY

To: Robert Jusell (Judge)
200 E. Wall St. Room 222
Midland Texas 79701

FROM: Angel Pina #11776-054
Leavenworth Prison Camp
P.O. Box 1000
Leavenworth Kansas 66048

Re: Compassionate Release
Request under 3582

Case No: 7:08-CR-181-05 RAJ

Petitioner is writing Pro
Se to this honorable court on
June 16, 2020 requesting Rule 3582
Petitioner would ask that
this request in letter form be
construed as an official request
by the courts as a request for
Compassionate Release under
Federal Rule 3582.

Petitioner admits that he has no knowledge of law, nor has he been trained on how to file the proper request in Motions form. Therefore he also request that this honorable court appoint him counsel to assist him for further proceedings if this court accepts this 3582 request.

Petitioner also believes that he has satisfied the court's requirement of exhaustion remedy.

Petitioner did send a request to the warden of Leavenworth via email on March 24, 2020 requesting that he be sent to home confinement amid the Covid-19 outbreak in the (BOP) Federal Bureau of Prisons. His request was never responded to by the warden. (See Exhibit A)

Petitioner affirms that he meets all of the CDC's health issues that puts him at high-risk, that if he contracts the virus there would be a higher

possibility that he could suffer the worst case scenario "Death"

Petitioner suffers from several chronic health conditions, recently having to go through heart surgery. (See Exhibit B)

Petitioner also has medical official record of the numerous chronic health conditions that could also leave him at high-risk of contracting Covid-19. (See Exhibit C)

Petitione Prays that this Honorable Court accepts his request and allow him to move forward under Rule 3582 Compassionate Release

Respectfully Submitted

Joseph J. Africano

Date:
06-22-20

TRULINCS 71776054 - PINA, ANGEL VINICIO - Unit: LVN-F-G

Exhibit A

FROM: 71776054
TO: WARDEN
SUBJECT: ***Request to Staff*** PINA, ANGEL, Reg# 71776054, LVN-F-G
DATE: 03/24/2020 05:07:21 PM

To: Mr. Warden
Inmate Work Assignment: DTS Orderly

Dear Sir,

The reason of my writing to you, is to humbly and respectfully request an early release.
I'm very scare and concern with the risk of being infected with the novel Corona virus.
Before experiencing my heart operation, I had two heart attacks.
I have a very serious medical condition, such as a double by pass open heart surgery, done in February 2018.
I have a severe heart condition, with multiple dysfunctional arteries, pertaining to my coronary disease.
High blood pressure, High cholesterol.
All this information you could find in my medical records.

I do thank you very much for your time in this very important matter to me.
Sincerely thankful,
Angel Pina de los Santos

Exhibit B

ST. FRANCIS MEDICAL CENTER
 601 HAMILTON AVENUE
 TRENTON, NJ 08629

DISCHARGE SUMMARY

NAME: ANGEL VINICIO PINA

MR#: 438541

DATE OF BIRTH: [REDACTED]

ACCOUNT #: 401800077812

ADMITTED: 02/05/2018

DISCHARGED:

110/67. Arrangements have been made to transfer him back to Fort Dix.

DISCHARGE MEDICATIONS:

He is going on the following medications:

1. Omeprazole 20 mg 1 tablet daily.
2. Aspirin 81 mg daily.
3. Atorvastatin 40 mg nightly.
4. Oxycodone/acetaminophen 5/325 one tablet every 4-6 hours as needed for pain.
5. Metoprolol 50 mg q.12 hours.
6. Sennosides 8.6 mg/50 mg 1 tablet twice daily as needed for constipation.

DISCHARGE INSTRUCTIONS:

The patient was instructed to shower daily to keep his incision clean and dry, not to lift anything greater than 5 pounds for 6 weeks, no driving for a minimum of 6 weeks and he must be off narcotics before driving. He is to continue doing incentive spirometer 10 times an hour. He is to see Dr. Luciano in 1-2 weeks and Cardiology, Dr. Soffer in 1-2 weeks as well. He is on a cardiac diet. The patient agrees to the plan and is stable for discharge.

Dictator: Victoria O'Hara, PA

Dictated For: Pasquale Luciano, DO

Job ID: 1066220/2467679

DD: [REDACTED] 10:32 DT: 02/11/2018 11:08

CC: Fort Dix, Mid Jersey IPA, 2A

DISCHARGE SUMMARY

Page 2 of 2

ST. FRANCIS MEDICAL CENTER
601 HAMILTON AVENUE
TRENTON, NJ 08629

Exhibit C

DISCHARGE SUMMARY

NAME: ANGEL VINICIO PINA

MR#: 438541

DATE OF BIRTH: [REDACTED]

ACCOUNT #: 401800077812

ADMITTED: 02/05/2018

DISCHARGED:

DISCHARGING PHYSICIAN:

Dr. Vigilance.

ADMITTING DIAGNOSIS:

Coronary artery disease.

SECONDARY DIAGNOSES:

1. Hypertension.
2. Hyperlipidemia.
3. Gastroesophageal reflux disease.
4. Hepatitis C.
5. History of peptic ulcer disease.

DISCHARGING DIAGNOSIS:

Coronary artery disease, status post coronary artery bypass grafting.

SURGERIES DURING THIS ADMISSION:

Coronary artery bypass grafting x2 with LIMA to LAD, saphenous vein graft to diagonal.

DATE OF SURGERY:

02/06/2018.

HOSPITAL COURSE:

This is a 56-year-old male with the above past medical history, who is an inmate at Fort Dix, who underwent the above surgery on 02/06/2018. He was transferred to the CTCU on ventilatory support. Labs were followed daily and electrolytes were repleted as necessary. Blood sugars were controlled with an insulin protocol and a sliding scale insulin. He was extubated on postop day zero. He was given nebulizers and incentive spirometer throughout his admission and was eventually weaned off of nasal cannula to room air. He ambulated without difficulty on postop day #1. His chest tubes, Foley, lines, and wires were removed throughout the rest of his admission. On postop day #4, he was transferred to telemetry where he continued to improve. On day of discharge, his labs included creatinine of 0.62, hemoglobin of 9.5, white blood cell count of 8.7. He is in sinus rhythm. Initially postoperatively, he was in sinus tachycardia, but beta-blocker was titrated with good results.

On day of discharge, his vital signs are stable. His heart rate is 94, his respirations are 22, pulse ox is 94% on room air, and his blood pressure is

DISCHARGE SUMMARY

Page 1 of 2

71776-054

Case 7:08-cr-00181-DC Document 285 Filed 06/26/20 Page 7 of 7

Angel V Pina
PO BOX 1000 FPC
Leavenworth, KS 66048
United States

KANSAS CITY 64102
23 JUN 2020 PM-4-1



RECEIVED

JUN 26 2020

71776-054

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
Robert June ^{III} Sr. ~~BY~~ ^{CLERK}
Western District Courthouse ^{DE JURY}
200 E WALL ST
Room 222
Midland, TX 79701
United States

79701-520172

